

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action
No. 05 11395 RCL

PATRICIA BERGEVINE,

Plaintiff

v.

PEASE & CURREN, INC., PEASE &
CURREN MATERIALS, INC., FRANCIS H.
CURREN, III A/K/A KIP CURREN, AND
MEREDITH CURREN

Defendants

DEFENDANTS' RULE 26 (c) CERTIFICATION

We, Joseph H. Aronson and Laura G. Ryan, counsel for the defendants, hereby certify that we contacted and/or attempted to contact plaintiff's counsel to confer about the subject of defendants' Motion for Protective Order prior to filing the same, in an effort to resolve the dispute without court action. Specifically, on April 20, 2006, Joseph H. Aronson telephoned plaintiff's counsel and left a detailed message asking whether plaintiff's counsel would be amenable to deferring the defendants' depositions for six months since information had come to light that the criminal proceedings will be decided within the next six months. The plaintiff's counsel did not respond to this telephone call.

On April 24, 2006, before filing the Motion for Protective Order, Laura Ryan spoke to plaintiff's counsel advising of the defendants' intention to file the Motion. The plaintiff's counsel advised Ms. Ryan that she would discuss the matter with her co-counsel, but would likely oppose the Motion.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 2ND DAY OF MAY, 2006.

/s/ Joseph H. Aronson

/s/ Laura G. Ryan

Joseph H. Aronson, BBO # 022070
Laura G. Ryan, BBO # 653793
THE McCORMACK FIRM, LLC
One International Place
Boston, MA 02110
(617) 951-2929

CERTIFICATE OF SERVICE

I, Joseph H. Aronson, hereby certify that on May 2, 2006, the foregoing document, Defendants' Rule 26(c) Certification, which is being filed through the ECF system, was served electronically to the following recipient identified as a registered participant on the Notice of Electronic Filing (NEF):

*Gregory Aceto, Esq.
Johnson & Aceto, PC
67 Batterymarch Street
Boston, MA 02210*

In addition, a copy of the foregoing Defendants' Rule 26(c) Certification was served via first class mail on May 2, 2006 upon the following attorney of record, who has not been identified as an ECF recipient:

*Bruce Gladstone, Esq.
Cameron & Mittleman, LLP
56 Exchange Terrace, Suite 2
Providence, RI 02903-1766*

/s/ Joseph H. Aronson
Joseph H. Aronson